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**From:** Thoms, Sharon [Thoms.Sharon@epa.gov]  
**Sent:** 7/28/2021 6:40:31 PM  
**To:** Froede, Carl [Froede.Carl@epa.gov]  
**CC:** Frederick, Tim [Frederick.Tim@epa.gov]; Amoroso, Cathy [Amoroso.Cathy@epa.gov]; Brock, Martha [Brock.Martha@epa.gov]  
**Subject:** RE: Draft eco risk review comments on D1 ROD for ORR EMDF  
**Attachments:** 07\_28\_2021 Eco cmts EMDF ROD.311 w sign.pdf

Carl,

Thanks for your quick reply. I send my completed comments. I copied Martha since I mentioned ARARs. Any questions you may have do not hesitate to ask.

Sharon

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**From:** Froede, Carl <Froede.Carl@epa.gov>  
**Sent:** Wednesday, July 28, 2021 6:45 AM  
**To:** Thoms, Sharon <Thoms.Sharon@epa.gov>  
**Cc:** Frederick, Tim <Frederick.Tim@epa.gov>; Amoroso, Cathy <Amoroso.Cathy@epa.gov>  
**Subject:** RE: Draft eco risk review comments on D1 ROD for ORR EMDF  
**Importance:** High

Good morning Sharon,

Thank you very much for your review comments on the EMDF D1 ROD.

FYI – The construction of a CERCLA hazardous waste landfill was never foreseen by the folks developing policy and guidance for the program. So, this approach to CERCLA hazardous waste management is unique and poorly defined (as you have identified). I am not aware of any existing CERCLA landfill that has ever conducted a baseline risk assessment whether using pre-defined hazardous waste (from anticipated sources) or at post-closure. However, the WAC is developed to consider risk protection to an intruder and a farmer following landfill closure and this assessment does draw from anticipated hazardous waste sources.

The protection of Bear Creek fisherpersons was part of the EPA Administrator's decision and that work remains ongoing at present. However, it does not consider benthic invertebrates as part of the decision, only to quantify the specific radionuclides found in the fish community along Bear Creek.

I hope that this info helps you understand how your comments will be used.

Thank you again for your comments,

Carl

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**From:** Thoms, Sharon <Thoms.Sharon@epa.gov>  
**Sent:** Tuesday, July 27, 2021 5:27 PM  
**To:** Froede, Carl <Froede.Carl@epa.gov>  
**Cc:** Frederick, Tim <Frederick.Tim@epa.gov>  
**Subject:** Draft eco risk review comments on D1 ROD for ORR EMDF

Hi Carl,

I am pleased to provide draft ecological comments on the draft 1 record of decision for the environmental management disposal facility at Oak Ridge. I am providing my draft comments early so you can give me feedback. You asked for an evaluation of the protectiveness and I am running into difficulties as there was no risk assessment for the ROD. Please review and let me know if I am on the right track.

Thanks,

Sharon